



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/JDG/CMP
F.#2008R00530

271 Cadman Plaza East
Brooklyn, New York 11201

February 3, 2012

By ECF and Federal Express

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Re: United States v. Thomas Gioeli, et al.
Criminal Docket No. 08-240 (BMC)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government's obligations under Brady v. Maryland, 373 U.S. 83 (1963) and Court's prior order of November 4, 2009,¹ the government hereby furnishes the following additional discovery in the above-captioned case.

Please note that Discovery Exhibits 1361 to 1362 contain Internal Affairs Bureau ("IAB") Source Materials, as defined in the government's January 30, 2012 discovery letter (ECF Docket No. 1340).

¹ See United States v. Gioeli, et al., No. 08 CR 240 (BMC), ECF Docket No. 442 (filed November 4, 2009).

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1361	CD containing Box 2 of the IAB Source Materials, organized into PDF files according to the original file folders and labeled "Folders 1-38"
1362	CD containing Box 3 of the IAB Source Materials, organized into PDF files according to the original file folders and labeled "Folders 1-38"

Sincerely,

LORETTA E. LYNCH
United States Attorney

By: /s/ Cristina M. Posa
Elizabeth A. Geddes
James D. Gatta
Cristina M. Posa
Assistant U.S. Attorneys

cc: All counsel (by ECF) (w/o enclosures)
Clerk of the Court (BMC) (by ECF) (w/o enclosures)